

National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



January 10, 2013

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Attendees at the Caltech Dinner and Panel Discussion on January 10, 2013

On January 10, 2013, Caltech Y and the Keck Institute for Space Studies (KISS), both non-profit organizations under section 501(c)(3) of the Internal Revenue Code, will host a dinner and space policy public panel entitled, "Science and the New Space Race: Opportunities and Obstacles." The event will take place at the Caltech Athenaeum, in Pasadena, CA, at 5 PM. Approximately 200-500 people are expected to attend. The estimated cost of the event including all food and beverages is \$75.00 per person.

The KISS is in control of seating. The event will be attended by Caltech Y student organizers, KISS Steering committee members and guests and W.M. Keck Foundation representatives. I find that this event meets the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). I further determine that there is an Agency interest in having NASA personnel attend the event because it will further Agency programs or operations. Attendance at the event will provide NASA attendees with the opportunity to exchange information regarding various NASA programs.

Accordingly, NASA employees whose duties do not substantially affect the sponsor, including NASA employees in non-career positions who are required to sign the ethics pledge under Executive Order 13490, may accept an invitation for themselves and an invited guest for free attendance to the event.

However, NASA employees whose duties may substantially affect the event sponsor, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone